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Specification

The specification has been amended to remove URI's per the Examiner's request. Applicant respectfully submits that these changes are purely formal in nature and do not affect the scope of the application.

Art rejections: general comments

The art rejections are respectfully traversed.

Since the references are complex, Applicants will confine their remarks to those portions of the references cited by the Examiner, except as otherwise indicated. Applicants make no representation as to the contents of other portions of the references.

The Examiner's other rejections and/or points of argument not addressed would appear to be moot in view of the following. Nevertheless, Applicants reserve the right to respond to those rejections and arguments and to advance additional arguments at a later date. No arguments are waived and none of the Examiner's statements are conceded.

Applicant particularly objects to the official notice taken. Without having the actual reference or references referred to, Applicant is unable to evaluate whether it would be obvious or even feasible to combine them with the other references.

Art rejections: independent claims: weather-related conditions

The independent claims both recite displaying a driving scene to a driver of an automobile and filtering that improves the quality of the image when degraded by a weather condition. In making an invention, often the most important part of the process is recognizing

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that there is a problem that needs to be solved. In this case, the problem that needed to be recognized particularly related to the image degradation experienced by drivers of cars due to weather-related conditions.

The Examiner has not indicated where the Sancyoshi reference allegedly recognizes that weather degrades images for drivers of vehicles or that special filtering might be required to compensate for such image degradation. Indeed, so far as Applicant can tell, the method of Sancyoshi does not compensate for weather-related conditions at all, and mostly likely would not function well under such conditions.

The Examiner cites Lawton as allegedly overcoming the deficiencies of Sancyoshi. Applicant respectfully submits that the Examiner mischaracterizes the Lawton reference. The Examiner cites col. 2, lines 13-24, apparently because the lines use the word "snow" in describing the type of noisy images that the method is supposed to deal with. Reading this section in context, Applicant does not believe that the snow referred to here is a weather-related condition. The term "snow" is commonly applied in this art to refer to any kind of speckled noise on an image. Accordingly, those of ordinary skill in the art do not normally interpret this term as used in this context as relating to weather-related image degradation problems. Indeed, the reference specifically says at col. 1, lines 62-65 that the dust or snow-like appearance is due to electronic noise. It appears that the image degradation that is referred to is degradation that occurs after the image is taken see col. 1, lines 56 to col. 2 line 5. Applicant therefore respectfully submits that the reference fails to teach or suggest that it is applicable to image of a driving scene degraded by weather related conditions.

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Art rejections: independent claims: salt & pepper filtering

The independent claims further recite that the filtering is of a "salt and pepper" type. The claim recites that the salt and pepper filtering is to be applied to "the pixels of the received images," [emphasis added] which, in accordance with standard English grammar, implies grammatically that the whole image is to be filtered.

The Examiner alleges he finds these features in Lawton, admitting that Saneyoshi fails to teach or suggest the same. It is not clear to Applicant, based on the section referred to by the Examiner that Lawton teaches or suggests salt and pepper filtering, as claimed. Instead, it appears that blotches are hunted for, whether manually or automatically, and filled with values from adjacent pixels, please see cols. 3-4 of Lawton. Applicant does not understand this to be salt and pepper filtering, which normally is applied automatically to the whole image, consistent with the cited language from the claims.

Applicant accordingly respectfully submits that the Examiner has failed to make a *prima facie* case of obviousness against the claims.

The new claims recite additional patentable distinctions over the references commensurate with the scope of the disclosure.

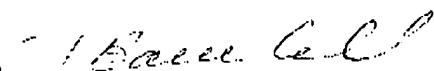
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Please charge any fees other than the issue fee to deposit account 14-1270. Please credit any overpayments to the same account.

Applicant respectfully submits that he has addressed each issue raised by the Examiner and that the application is accordingly in condition for allowance. Allowance is therefore respectfully requested.

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Respectfully submitted,

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